

04-7336
10/10/71



MARMON GROUP

CER 113252

Monsanto Chemical Company

FROM: M. R. Foreman - 34WT (4-3299)

JUL 2 • 1987

DATE: July 17, 1987

cc: L. J. Giesch - 35NV
J. V. Kocurkovic - 35NK
V. T. Matteucci - 35NR
G. L. McKee - 35NA
J. P. Robb - 35SA

SUB : Weekly Summary

REF :

TO : M. A. Pierle - 64WT

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VSK - Groundwater Study

III. EPA and U.S. EPA Region V completed their review of the Geraghty & Miller Groundwater Study and forwarded comments to the plant. The general conclusion of the joint review was ... "that the assessment needs to be expanded. Downgradient and deep aquifer conditions are not adequately described. Both onsite and offsite sources of contamination have not been sufficiently identified.Known contamination problems representing substantial risks to the public health and environment are dismissed." Additionally III. EPA requests that the plant consider the pumping and treatment of large amounts of groundwater to clean the aquifer and provide a source of water for the plant processes. Agreement on needed future actions will be difficult.

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CER 113253



SAUGET SITES REMEDIAL INVESTIGATION-PROJECT UPDATE

FACT SHEET #2 DECEMBER, 1986

The Illinois Environmental Protection Agency (IEPA) study of hazardous waste sites in Sauget and Cahokia, recently entered a new phase. Samples of soil, surface water, creek sediments and air will be collected during the next few months for extensive laboratory analysis. Results of the testing will enable the Agency to identify the chemical contaminants present, the locations affected by the contaminants and potential solutions to the Dead Creek area problems.

This phase of the study follows several months of extensive historical record searches, property ownership investigations and access arrangements, map making and a revision of the initial goals of the project. The results of the revision will assist the IEPA in obtaining an accurate description of the Dead Creek area hazardous wastes and will also provide the information necessary to evaluate the project for possible federal Superfund financing.

How will the sampling be done?

Because of the long history of chemical waste disposal in the St. Louis Metro East, the field work was designed to obtain samples that best represent the extent and nature of contamination. Historical records and conversations with local citizens provided IEPA with information valuable in the initial choices of sampling locations.

Surface water and sediment samples were taken from various locations on Dead Creek and area surface soils were also sampled in November. Soil gas tests done to determine "hot spots" of underground contamination will point out the most effective locations to install 25 monitoring wells around the study area. The wells, drilled by a truck-mounted rig, will enable sampling of the water supply below the ground's surface. Drilling will continue all winter so that samples can be collected and tested for contamination in the late spring, 1987.

Sampling activities will be performed in special protective clothing by employees of an environmental consulting firm under contract with IEPA.

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Formal

State of Wash. Att

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Status of Pits

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What is WGR RCRA Status?

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CER 113255

... (cont'd)

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General Saugnet area

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Pits, Lagoons -

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CER 113256

Monsanto

Monsanto Chemical Company
500 Monsanto Ave
Savage, Illinois 62208-1198
Phone: (618) 271-5835

September 12, 1986

Mr. Nicholas Valkenburg
Geraghty & Miller, Inc.
125 East Bethpage Road
Plainview, New York 11803

Dear Nick:

Confirming our direction from our meetings of September 8 and 9, please prepare the following documents relative to the Monsanto and SSDRA groundwater programs so that we may proceed to interface with Region V USEPA and IEPA.

1. Route 3 Drum Site investigation report including coring data and justification of the clay cap mitigation alternative.

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2. Monsanto groundwater report including groundwater quality data, and justification for a no action alternative on groundwater mitigation. Also note plans for source mitigation at the Route 3 Drum Site and landfill will be forthcoming and justify no action alternative for other sites. I have transmitted the Metropolitan Sewer District river study data to you for your use in preparing this report. Descriptions of groundwater protection work that has been completed at the plant, such as sewer repairs, will be sent to you federal express on September 15 and I anticipate calling you with miscellaneous comments on your draft groundwater data report on the 15th or 16th. We would appreciate your suggestions on the best way to review this report prior to final publication as the scheduled September 30 meeting makes this schedule extremely tight.

3. SSDRA well log and location information as we discussed on September 11.

4. SSDRA groundwater data report with justification for lagoons and pit capping with sidewalls plus no action alternative on groundwaters in any other sources. You may choose to issue the lagoons and pit capping proposal in a separate package at your option. The groundwater portion of the package needs to be available for the SSDRA meeting on September 30 as we plan to use some of the information from this report in our verbal discussions with the EPA on October 1 and 2.

CER 113257

Nicholas Valkenburg
Page 2
September 12 1986

Monsanto Landfill mitigation report with justification.

ALL MATTER HAS BEEN
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If you have questions or comments on the above, please give me a call.

Sincerely



Warren L. Skull
General Superintendent
Environmental Affairs

(b)(1)

cc R. L. Biggerstaff
M. R. Foreman
P. J. Haehrel
J. W. Molloy

VIA FEDERAL EXPRESS

CER 113258

Monsanto

Aug 8 1986



FROM: W. L. Smull - WCK
NAME - LOCATION - PHONE

DATE: August 5, 1986

SUBJECT: WCK GROUNDWATER STUDY

TO:

R. T. Allen - G3WB
R. L. Biggerstaff - CS7J
J. O. Bright - CS6G
M. R. Foresman - B3NA
B. J. Gilhousen - G3WB
P. J. Haechrel - WCK
F. E. Kearney - E3NA

V. T. Matteucci - B3SB
G. L. McKee - E3SE
J. W. Molloy - WCK
M. A. Pierle - E3NA
W. W. Varnado - G3WD
J. H. Waldbeser - CS7H

You are invited to attend a review of the WCK Groundwater Study on Tuesday, September 9, 1986, at 10:00 a.m. David Miller of Gensaghty & Miller will make the presentation in room G-403-C.

Please call Barb Jones, ext. 2388 - WCK, to confirm your attendance.

W. L. Smull

/bjj

Law Engr.

CER 113259

M-1132

125K Groundwater Study

What is purpose of meeting and what is
expected of attendees.

Get copy of Heinz

So Drum Lot Project

ALL INFORMATION CONTAINED
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Drum Project (NCB)

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 11/11/01 BY 1043
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CER 113260

D. Miller -

-an Engle

CER 113261

Monranto



FROM W. L. Smull - WCK
(NAME-LOCATION-PHONE)

DATE August 27, 1986
SUBJECT SOUTH LOT DRUMSITE

cc V. T. Matteucci - B3SB
J. W. Molloy
N. Valkenburg, Geraghty & Miller

REFERENCE

TO R. T. Allen - G3WB
M. R. Foreman - B3NA
G. L. Jones

*To : F.R.K. / A.P.
F.R.K. Return file 9/2*

Attached is a letter received from USEPA Region V relative to the South Lot Drumsite for your review. We will set up a meeting with you next week after you have had a chance to review it.

W. L. Smull
W. L. Smull

/bjj
Attachment

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CER 113262

IN-1132



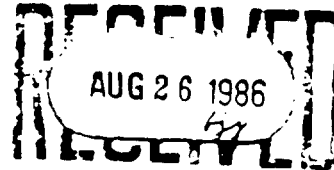
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF
5H-13



Mr. Warren L. Smull, General Superintendent
Environmental Affairs
Monsanto Chemical Company
500 Monsanto Avenue
Sauget, Illinois 62206-1198

Re: Facility Clean-up of
Uncontrolled Drum Disposal Area
ILD 000 602 702

Dear Mr. Smull:

We have received and reviewed your letter to Basil Constantelos of July 30, 1986, documenting the discovery and clean-up of an area on your site containing 30 drums of hazardous materials and associated contaminated soil.

Under the provisions of the Hazardous and Solid Waste Amendments of 1984 (HSWA), any permit issued under the Resource Conservation and Recovery Act (RCRA) "shall require corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit." As a result of this provision, the area which contained the drums will have to be investigated prior to any RCRA permit decision with regard to the need for corrective action. Such investigations could require additional sampling and excavation above that which has been done.

While the information you provided in your letter is necessary, it is likely not to be adequate to determine whether or not corrective action is required. Further investigations could prove difficult (and thus costly) especially if new facilities have been constructed on the site to minimize the likelihood of such a complication, you should consider consulting the Illinois Environmental Protection Agency (IEPA) and our Agency regarding the adequacy of the clean-up. IEPA should also be contacted regarding the storage of the recovered wastes and whether a modification to your Part A permit application is needed.

If you have questions regarding this matter, please contact Rob Watson of IEPA at 217/785-8410 or Gale Hruska of my staff at 312/886-0989.

Sincerely yours,

Gale Hruska for
James N. Mayka, Chief
Illinois Technical Unit

CER 113265

cc: Larry Eastep, IEPA
Rob Watson, IEPA

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subsection shall be construed to diminish the liability of any person under section 107 or 111 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 or other applicable law.

"(4) For the purpose of this subsection, the term 'guarantor' means any person, other than the owner or operator, who provides evidence of financial responsibility for an owner or operator under this section."

CONTINUING RELEASES AT PERMITTED FACILITIES

Sec. 206. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (c) thereof:

"(u) **CONTINUING RELEASES AT PERMITTED FACILITIES.**—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."

CORRECTIVE ACTION BEYOND FACILITY BOUNDARIES: UNDERGROUND TANKS

Sec. 207. Section 3004 is amended by adding the following after subsection (u):

"(v) **CORRECTIVE ACTIONS BEYOND FACILITY BOUNDARY.**—As promptly as practicable after the date of the enactment of the Hazardous and Solid Waste Amendments of 1984, the Administrator shall amend the standards under this section regarding corrective action required at facilities for the treatment, storage, or disposal of hazardous waste listed or identified under section 3001 to require that corrective action be taken beyond the facility boundary where necessary to protect human health and the environment unless the owner or operator of the facility concerned demonstrates to the satisfaction of the Administrator that, despite the owner or operator's best efforts, the owner or operator was unable to obtain the necessary permission to undertake such action. Such regulations shall take effect immediately upon promulgation, notwithstanding section 3010(b), and shall apply to—

"(1) all facilities operating under permits issued under subsection (c) and

"(2) all landfills, surface impoundments, and waste pile units (including any new units, replacements of existing units, or lateral expansions of existing units) which receive hazardous waste after July 26, 1982.

Pending promulgation of such regulations, the Administrator shall issue corrective action orders for facilities referred to in paragraphs (1) and (2), on a case-by-case basis, consistent with the purposes of this subsection.

"(w) **Unremediated Tanks.**—Not later than March 1, 1985, the Administrator shall promulgate final permitting standards under

CER 113264

this section for underground tanks that cannot be entered for inspection. Within forty-eight months after the date of the enactment of the Hazardous and Solid Waste Amendments of 1984, such standards shall be modified, if necessary, to cover at a minimum all requirements and standards described in section 9003."

FINANCIAL RESPONSIBILITY FOR CORRECTIVE ACTION

Sec. 208. Section 3004(a) of the Solid Waste Disposal Act (as redesignated by section 201 of this Act) is amended by inserting "including financial responsibility for corrective action," immediately after "and financial responsibility" in paragraph (6).

MINING WASTE AND OTHER SPECIAL WASTES

Sec. 209. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (w):

"(x) If (1) solid waste from the extraction, beneficiation or processing of ores and minerals, including phosphate rock and overburden from the mining of uranium, (2) fly ash waste, bottom ash waste, slag waste, and flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels, or (3) cement kiln dust waste, is subject to regulation under this subtitle, the Administrator is authorized to modify the requirements of subsections (c), (d), (e), (f), (g), (h), (i), (j), (k), (l), (m), (n), (o), (p), (q), (r), (s), (t), (u), and (v) and section 3006(j), in the case of landfill or surface impoundments receiving such solid waste, to take into account the special characteristics of such wastes, the practical difficulties associated with implementation of such requirements, and site-specific characteristics, including but not limited to the climate, geology, hydrology and soil chemistry at the site, so long as such modified requirements assure protection of human health and the environment."

Subtitle B--Amendments Primarily to Section 3003

AUTHORITY FOR PERMIT TO CONSTRUCT HAZARDOUS WASTE TREATMENT, STORAGE, OR DISPOSAL FACILITIES

Sec. 211. Section 3003(a) of the Solid Waste Disposal Act is amended by--

(1) striking "a" immediately after "owning or operating" in the first sentence and inserting in lieu thereof "an existing facility or planning to construct a new";

(2) inserting in the second sentence "and the construction of any new facility for the treatment, storage, or disposal of any such hazardous waste" immediately after "any such hazardous waste"; and

(3) adding the following at the end thereof: "No permit shall be required under this section in order to construct a facility if such facility is constructed pursuant to an approval issued by the Administrator under section 6(e) of the Toxic Substances Control Act for the incineration of polychlorinated biphenyls and any person owning or operating such a facility may, at any time after operation or construction of such facility has begun, file an application for a permit pursuant to this section authorizing such facility to incinerate hazardous waste identified or listed under this subtitle."

CER 113265

CER 113266

ing a temporary or permanent injunction.
district in which the facility is located for appropriate relief, including
commenced a civil action in the United States district court in the
present human health or the environment or the Administrator may
five years or such other period as the Administrator may determine
this subject, the Administrator may issue an order requiring owner-
more than a facility authorized to operate under section 3006(e) of
there is or has been a release of hazardous waste into the environ-
on the basis of any information the Administrator determines that
"(b) LITIGATION STARTS COLLECTIVE ACTION ORDERS.—(1) Whenever

thereof;
amended by adding the following new subsection after subsection (g):
Sec. 222. (a) Section 3006 of the Solid Waste Disposal Act is

ORDERING STARTS COLLECTIVE ACTION ORDERS

amended by striking out "having obtained"
(c) Section 3006(2)(A) of the Solid Waste Disposal Act is
to a fine of not more than \$1,000,000.
shall upon conviction or violation of this subsection, be subject
not more than fifteen years, or both. A defendant that is an organi-
be subject to a fine of not more than \$250,000 or imprisonment for
known: danger of death or serious bodily injury, shall, upon conviction,
knows at that time that he thereby placed another person in un-
transport, treat, store, dispose of, or export any hazardous
waste identified or listed under this subtitle in violation of par-
transport, treat, store, dispose of, or export any hazardous
person who knowingly

and as follows:
(b) Section 3006(e) of the Solid Waste Disposal Act is amended to
both fine and imprisonment.
under the respective paragraph shall be doubled with respect to
of such person under this paragraph, the maximum punishment
If the conviction is for a violation committed after a first conviction
five years in the case of a violation of paragraph (1) or 2, or both,
for each day of violation, or imprisonment not to exceed two years
shall, upon conviction, be subject to a fine of not more than \$50,000
shall, upon conviction, be subject to a fine of not more than \$50,000
accrued by a defendant:

the case of a State program authorized under this subtitle, to be
by regulations promulgated under this subtitle, or by a State in
transported without a manifest, any hazardous waste required
transport, treatment, storage, or disposal, or export, to be

program, under this subtitle:
Administrator, or by a State in the case of an authorized State
purpose of compliance with regulations promulgated by the
report, or other document required to be maintained or filed for
alter, conceal, or fails to file any record, application, manifest,
the enactment of this paragraph) and who knowingly destroys
such activity took place before or takes place after the date of
of, export, or otherwise handles any hazardous waste, whether
transport, treat, store, dispose of, or export, or otherwise
known: danger of death or serious bodily injury, shall, upon conviction,
an authorized State program, under this subtitle:

promulgated by the Administrator, or by a State in the case of
manifest, record, report, permit, or other document filed, main-
maintained, or used for purposes of compliance with regulations
material element or representation in any application, label,
(3) knowingly omits material information or makes any false

H. R. 2847—38

"(2) Any order issued under this subsection may include a suspension or revocation of authorization to operate under section 3005(e) of this subtitle, shall state with reasonable specificity the nature of the required corrective action or other response measure, and shall specify a time for compliance. If any person named in an order fails to comply with the order, the Administrator may assess, and such person shall be liable to the United States for, a civil penalty in an amount not to exceed \$25,000 for each day of noncompliance with the order."

"(b) Subsection (b) of section 3008 of the Solid Waste Disposal Act is amended by inserting "issued under this section" immediately after "Any order".

EFFECTIVE DATE OF REGULATIONS

Sec. 234. Section 3010(b) of the Solid Waste Disposal Act is amended by adding the following at the end thereof: "At the time a regulation is promulgated, the Administrator may provide for a shorter period prior to the effective date, or an immediate effective date for:

"(1) a regulation with which the Administrator finds the regulated community does not need six months to come into compliance;

"(2) a regulation which responds to an emergency situation; or

"(3) other good cause found and published with the regulation."

SUBTITLE D—New Sections In SUBTITLE C

MANAGEMENT OF USED OIL

Sec. 241. a. Section 3014 of the Solid Waste Disposal Act relating to restrictions on recycled oil, as redesignated by section 302 of this Act relating to technical and clerical amendments, is amended by inserting "a. In General.—" after "3014," and by adding the following at the end thereof:

"(b) IDENTIFICATION OR LISTING OF USED OIL AS HAZARDOUS WASTE.—Not later than twelve months after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 the Administrator shall propose whether to list or identify used automobile and truck crankcase oil as hazardous waste under section 3001. Not later than twenty-four months after such date of enactment, the Administrator shall make a final determination whether to list or identify used automobile and truck crankcase oil and other used oil as hazardous wastes under section 3001.

"(c) USED OIL WHICH IS RECYCLED.—1) With respect to generators and transporters of used oil identified or listed as a hazardous waste under section 3001, the standards promulgated under section 3001(d), 3002, and 3003 of this subtitle shall not apply to such used oil if such used oil is recycled.

"2) A) In the case of used oil which is exempt under paragraph (1), not later than twenty-four months after the date of enactment of the Hazardous and Solid Waste Amendments of 1984, the Administrator shall promulgate such standards under this subsection regarding the generation and transportation of used oil which is recycled as may be necessary to protect human health and the environment. In

CER 113267

H. R. 2867-37

"(3) knowingly omits material information or makes any false material statement or representation in any application, label, manifest, record, report, permit, or other document filed, maintained, or used for purposes of compliance with regulations promulgated by the Administrator or by a State in the case of an authorized State program; under this subtitle;

"(4) knowingly generates, stores, treats, transports, disposes of, exports, or otherwise handles any hazardous waste (whether such activity took place before or takes place after the date of the enactment of this paragraph) and who knowingly destroys, alters, conceals, or fails to file any record, application, manifest, report, or other document required to be maintained or filed for purposes of compliance with regulations promulgated by the Administrator or by a State in the case of an authorized State program; under this subtitle;

"(5) knowingly transports without a manifest, or causes to be transported without a manifest, any hazardous waste required by regulations promulgated under this subtitle or by a State in the case of a State program authorized under this subtitle) to be accompanied by a manifest;

shall, upon conviction, be subject to a fine of not more than \$30,000 for each day of violation, or imprisonment not to exceed two years (five years in the case of a violation of paragraph (1) or (2)), or both. If the conviction is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment under the respective paragraph shall be doubled with respect to both fine and imprisonment.

"(b) Section 3006(e) of the Solid Waste Disposal Act is amended to read as follows:

"(c) **Knowing Endangerment.**—Any person who knowingly transports, treats, stores, disposes of, or exports any hazardous waste identified or listed under this subtitle in violation of paragraph (1), (2), (3), (4), (5), or (6) of subsection (d) of this section who knows at that time that he thereby places another person in imminent danger of death or serious bodily injury, shall, upon conviction, be subject to a fine of not more than \$250,000 or imprisonment for not more than fifteen years, or both. A defendant that is an organization shall, upon conviction of violating this subsection, be subject to a fine of not more than \$1,000,000."

"(d) Section 3006(d)(2)(A) of the Solid Waste Disposal Act is amended by striking out "having obtained".

INTERNAL STATE CORRECTIVE ACTION ORDERS

Sec. 233. (a) Section 3006 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (g) thereof:

"(h) **INTERNAL STATE CORRECTIVE ACTION ORDERS.**—(1) Whenever on the basis of any information the Administrator determines that there is or has been a release of hazardous waste into the environment from a facility authorized to operate under section 3006(e) of this subtitle, the Administrator may issue an order requiring corrective action or such other response measure as he deems necessary to protect human health or the environment or the Administrator may commence a civil action in the United States district court in the district in which the facility is located for appropriate relief, including a temporary or permanent injunction.

CER 113266

Monsanto Chemical Company

FROM: M. R. Foresman - G4WT (4-3263)

DATE: November 10, 1986

cc: F. E. Kearney - G4WT

SUB: WGK Remedial Actions - EPA Meetings

REF:

TO: M. A. Pierle - G4WT

Detailed below is a summary of the meetings held with the Ill. and Federal EPA (Region V) on November 3rd and 4th to discuss the WGK groundwater study and proposed remedial actions. The individuals which represented Monsanto at both meetings included Jack Molloy, Warren Smull, Dick Biggerstaff, and Nick Valkenburg and Dave Miller of Geraghty & Miller.

Ill. EPA: 10-12 people from the agency including the Director and Assistant Director of the Solid Waste Section - Bill Child and Jim Frank.

Items Discussed: General groundwater Study, Route 3 remedial action alternative, Sauget Association remedial actions (pit, ponds, lagoons), Water quality main landfill, net loadings of organics on the river.

Groundwater Study - total site water quality, no impact discussion.

Route 3

Sauget Association

Main Landfill

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Material Provided: Three volume groundwater study and Route 3 drum site investigation report.

Response Requested

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Federal EPA Region V: 10 - 12 people including the Deputy Director of the Water Divisions, Ken Fenner and several engineers from the Superfund and RCRA sections.

Items Discussed: Same information as with the Ill. EPA.

CER 113268

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Material Provided: Three volume site groundwater report only.

Response Requested: None.

A complete list of the meeting attendees will be forwarded as it becomes available. If you have any questions, please advise.

ugx1110

M. R. Foresman

CER 113269

From M.A. Piarlo

T. H. Lafferre

FYI re WGX cleanups. A meeting with
RGP is set for 12/18/86.

M.A.P./pam
11/14/86

CER 113270

007702

Monsanto

FROM
(NAME-LOCATION-PHONE) M. A. Pierle - St. Louis, G4WT - 4-8882

DATE : November 17, 1986

cc.

SUBJECT : SAUGET SITE STUDIES

REFERENCE :

TO : M. R. Foresman G4WT
B. J. Gilhousen B3SH
V. T. Matteucci G5NR
J. W. Molloy 1740

On November 13, I talked with Jim Patterson, consultant for the Marmon Group who will visit us with the rest of their team on November 26. In addition, a Mr. Dan Edleman of a public relations firm spoke with Mr. Harrison the week of November 3 on the same subject.

Based on a conversation with Jim Patterson, he is concerned that without some action on industry's part in Sauget Village, the Illinois EPA will pursue to again collect information and, ultimately, list the area on the Federal Superfund National Priorities List. The Marmon Group has considerable experience with other Superfund sites and is not anxious for this area to reach that status. While they do not have any clear ideas to slow down the Illinois EPA activity, they are interested in joint discussions with us on this subject. Basically, they would like to explore with us other approaches which may be available to everyone in the Village to retain local control of this issue and keep it out of the Superfund system.

He feels that the Illinois EPA has already committed in their mind to justify listing this site and believes that any approaches to avoid this fate will require intervention at higher political levels. Given the current economic plight in the area and the adverse economic impact of some of the smaller companies being forced to major cleanup activities, he believes there is some possibility of getting a reason brought into the debate. Clearly, he recognizes that the local Searle people are behind in this area and they are trying to play catchup.

It should be an interesting meeting on November 26.

M. A. Pierle

(Typed and sent during
Mr. Pierle's absence.)

CER 113271

344.875/PAM.1

IN - 10 (REV. 8/77)

007453